

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
PLAINTIFF,	:	
	:	CASE No. 2:21-MJ-666
vs.	:	
	:	MAGISTRATE JUDGE
PAUL C. WELCH	:	CHELSEY M. VASCURA
	:	
DEFENDANT.	:	

**SECOND JOINT MOTION FOR EXTENSION OF TIME DURING WHICH
INDICTMENT/INFORMATION MUST BE FILED**

Now come the parties, through their undersigned attorneys, and jointly move this Court for an additional order extending the time for the scheduled preliminary hearing and return of an Indictment or Information pursuant to 18 U.S.C. § 3161(b) from December 10, 2021, to January 14, 2022. The defendant, Paul C. Welch, is aware of his right to a preliminary hearing and the timely filing of an Indictment or Information, afforded under 18 U.S.C. § 3161(b), and hereby waives those rights for the purposes of this motion. The parties believe this second continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

The United States has provided substantial pre-indictment discovery to defense counsel to examine and review with the defendant. However, because of the nature of the pre-indictment discovery, the travel and trial schedules of counsel, and the continued logistical difficulties in dealing with restrictions related to the COVID-19 virus, review of evidence and discussions about

a possible case resolution have been delayed. Thus, even with continued due diligence, counsel will have been unable to explore all relevant issues and guideline implications necessary to meaningfully discuss a possible resolution to this case prior to the time within which the preliminary hearing or and Indictment or Information must be filed on December 10, 2021. The parties are in agreement that a continuance of the preliminary hearing and time for indictment would best serve the interests of justice and the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

For these reasons, the parties request an extension of the time until January 14, 2022, within which a preliminary hearing will occur or Indictment or Information may be filed in this case.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney

s/David H. Thomas
DAVID H. THOMAS
Taft Stettinius & Hollister LLP
65 E. State St., Suite 1000
Columbus, OH 43215
(614) 334-6199
Attorney for Paul C. Welch
dthomas@taftlaw.com

s/Michael J. Hunter
MICHAEL J. HUNTER (0076815)
Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
(614) 469-5715
michael.hunter@usdoj.gov

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ORDER

Upon this second joint motion of the parties, and for the reasons set forth in the parties' joint motion, the Court hereby finds that there is good cause shown to grant an extension of time in which a preliminary hearing will occur or to return an Indictment or file an Information, that the extension would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A). Accordingly, the Court hereby GRANTS an extension of these dates until January 14, 2022, where a preliminary hearing will occur or an Indictment or Information will be filed pursuant to 18 U.S.C. § 3161(b).

Date

United States Magistrate Judge